

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FREE SPEECH COALITION, INC., et al.,

Plaintiffs,

v.

ANGELA COLMENERO, In Her Official
Capacity As Interim Attorney General For
The State Of Texas

Defendant.

CASE NO. 1:23-cv-00917-DAE

**REBUTTAL DECLARATION OF ANDREAS ALKIVIADES ANDREOU IN SUPPORT
OF PLAINTIFFS' MOTION FOR EXPEDITED PRELIMINARY INJUNCTION**

I, Andreas Alkiviades Andreou, declare as follows:

1. I provide this declaration in support of the Motion for Expedited Preliminary Injunction against enforcement of the Act of June 12, 2023, Ch. 676 (H.B. 1181) Tex. Sess. Law Serv. (“the Act”). I am over eighteen years of age, and I have personal knowledge of the matters set forth in this Declaration; if called as a witness I could and would testify competently to these matters.

2. I am informed that the Attorney General argues that the entirety of MG Premium Ltd’s and MG Freesites Ltd’s sites and services appeal wholly to the prurient interest, have no artistic value, and are patently offensive. Based on my professional knowledge, as well as my personal knowledge as a member of my community, this is not correct. The sites contain a significant amount of material—including both videos and images—that are minimally sexually explicit, and no more so in kind and degree than sexually themed scenes and content in “mainstream” current film and television content. For example, Pornhub includes podcasts by creators in the community discussing their work and issues faced by the community, educational content regarding sexual health and wellness (through The Pornhub Sexual Wellness Center), erotic nude photos, and comedic, non-pornographic content playing on industry tropes. SpiceVids, FakeTaxi, and Brazzers also have “soft core” content, including model profiles that have clothed pictures and image galleries of nude modeling.

3. I am also informed that the Attorney General relies on a declaration from Gail Dines stating: “Although Pornhub claims that all the videos they upload feature consensual sex, there are tags that intentionally misspell the word consensual as “consesual,” to avoid legal action. In July 2023, there were over 200,000 videos in the “Un Consesual” category, and 198,000 videos in the “Non Consesual Porn Porn videos category.”

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4. Pornhub does not have categories or tags for “Un Consensual” or “Non Consensual.” The term “Consensual” is banned from the site. Rather, searching for two terms with a space between them will return results for both terms. The results Ms. Dines received were thus for the terms “Un” and “Non.”

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 21, 2023 in Nicosia, Cyprus.

Dated: August 21, 2023

/s/ Andreas Alkiviades Andreou
Andreas Alkiviades Andreou

EXHIBIT 1

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What To Expect When Having Sex After A Hysterectomy

by [Dr Stacy Friedman](#)



Getting a hysterectomy is a very common medical procedure for people with uteruses. It can be done due to a number of reasons including heavy periods or fibroids, pelvic pain caused by something like endometriosis, prolapse or damage to the uterus, or cancer. A partial hysterectomy is when they just remove your uterus, and a full hysterectomy is a removal of your uterus and cervix. Removal of the ovaries is called an oophorectomy and may or may not be needed, depending on the reason you are having the surgery in the first place.

People who opt for a hysterectomy can be nervous as they may expect their sex drive to change or be

gone but if the ovaries are properly functioning and they do not need to be removed, a partial or full hysterectomy should not affect the drive since your ovaries are the organs that supply the hormones. If anything, many people say that their drive may even be better since they had so many issues or pain prior, which is why they needed the hysterectomy in the first place and now post-surgery, those issues and pain are no longer present once healed. As you would imagine, having a major surgery of any kind can take a while to recover and impact your sex life along the way. Here's how:

1. Recovery. Recovering from major surgery is always going to take time, patience, and rest. Give your body plenty of time to recover before pushing yourself to do or participate in anything strenuous—and that includes sex. It is generally recommended that you do not have sex until you are fully healed and are no longer experiencing discharge. Your doctor will give you instructions, but it is usually 6-8 weeks but can be up to 12 weeks depending on how you heal and the extent of your surgery. It is extremely important to listen to your doctor's instructions even if you are feeling better before then because you don't want to risk tearing anything inside, especially if you had your cervix removed. If this is the case, you will have a vaginal cuff, which is where they sew the area closed on the vagina once the cervix is removed, and that needs the time to heal.

2. Expect some dryness. Many people who have had hysterectomies (with or without their ovaries being removed, but especially when removed) experience new or worsened vaginal dryness. Remember that arousal is complicated and you may experience some non-concordance between your mind wanting sex and your body being ready for sex. Be sure to do plenty of foreplay and embrace using lube. Penetration without sufficient lubrication can lead to tears and pain that will not help the situation. Be prepared for dryness and know how to handle it.

3. Expect some changes in libido. At first, you may have a decrease in libido. This is completely normal. But don't worry—once you are fully recovered, most people bounce back just as (or more) horny than ever and even report having a better sex drive and sex life than before the operation. This is especially true for those who keep their ovaries.

4. Pain is normal, but not forever. If someone cuts you open, you are going to feel pain. Take it easy, follow your doctor's post-op instructions, and listen to your body. Some pain is normal, but it shouldn't stick around too long after the operation and should never be excruciating. If that happens, call your doctor.

5. Don't skip out on the condoms. Just because you don't have a uterus anymore and can no longer have a child, does not mean you are immune to contracting STIs. Be sure to continue to practice safe sex including using protection, getting screened, and being honest with your sex partners.

6. Talk to your partner. Explain what you want, what you need, and what you are experiencing. If you know you are going to have dryness or need more foreplay or that certain positions are more uncomfortable for you, have that conversation ahead of time. If you decide to be intimate with someone without having that conversation first, then be prepared with some efficient ways to communicate your needs quickly in the moment.

Key Takeaway: Take it slow. When you are healed and ready to start having sex again, take it slow. Your body has just been through a major operation and you need time to re-learn how to have sex in ways that feel good and right. Take it slow, listen to your body, and enjoy the fun of figuring it all out. Even your ability to orgasm may be different so you may need to relearn your body in new and exciting ways.

If you or your partner are experiencing sexual concerns of any kind, it may help to talk to a professional. Dr. Stacy Friedman holds a Doctorate degree in Human Sexuality in addition to a Masters in Clinical Sexology and is a Certified Sex Coach. She offers complimentary 15-minute phone consultations and ongoing coaching sessions online or in her Boca Raton, FL office. Call 561-899-7669 or visit <https://drstacyfriedman.com/> to schedule a consult today.



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